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15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF DEFENDANT
OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
ITS LETTER BRIEF IN OPPOSITION
TO WAYMO'S MOTION TO
COMPEL DISCOVERY AND
EXHIBITS THERETO (DKT. 2017)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendant Otto Trucking LLC's Administrative Motion to File Under Seal Portions of
6 Its Letter Brief in Opposition to Waymo's Motion to Compel Discovery and Exhibits Thereto
7 (Dkt. 2017).

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit B to the Walsh Declaration	Entire Document

10
11
12
13 3. The entirety of Exhibit B to the Walsh Declaration is an expert report from Mr.
14 Kevin Faulkner relating to Uber's computer and server systems. It contains highly confidential
15 information regarding the names and details of servers at Uber, and hostnames and serial numbers
16 of company and personal devices. This information is not publicly known, and its confidentiality
17 is strictly maintained. I understand that disclosure of this information would threaten the security
18 of the internal systems of Uber's network.

19 4. Exhibit B also contains lists of employees who were custodians of documents, as
20 well as personal contact information for some of the employees. Defendants request this
21 information be kept confidential in order to protect the privacy of individuals at a company that is
22 currently the subject of extensive media coverage.

23 5. Defendants' request to seal is narrowly tailored to the portions of Otto Trucking's
24 Motion and its supporting papers that merit sealing.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed this
26 20th day of October, 2017 in Washington, District of Columbia.

27 /s/ Michelle Yang

28 Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: October 20, 2017

/s/ Arturo J. Gonzalez
ARTURO J. GONZALEZ